

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

FRANCES CURD, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

PAPA JOHN'S INTERNATIONAL, INC.,  
d/b/a PAPA JOHNS,

Defendant.

Case No. 1:22-cv-03185-JRR

**DEFENDANT'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

Defendant Papa John's International, Inc. ("Papa John's"), by and through its undersigned counsel, hereby moves for an order dismissing Plaintiff Frances Curd's Complaint pursuant to Federal Rule of Civil Procedure 12(b)(2) or, alternatively, Rule 12(b)(6). As set forth in Papa John's Memorandum in Support of this Motion, there is no personal jurisdiction over Papa John's on Plaintiff's claims, and the Complaint fails to state any claim upon which relief may be granted.

DATED: February 17, 2023

Respectfully submitted,

By: /s/ Eric C. Bosset

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